IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA EASTERN DIVISION

ANDRIETTE ROWELL,)
Plaintiff,)
v.) NO.: 3:07-CV-475-WHA
CITY OF AUBURN, ALABAMA,)
Defendants.	<i>)</i>)

PLAINTIFF'S FIRST INTERROGATORIES TO DEFENDANT

Comes now the Plaintiff, Andriette Rowell, and propounds the following interrogatories to be answered by the Defendant within the time allowed by the Federal Rules of Civil Procedure:

- 1. Prior to answering these interrogatories, have you made due and diligent search of the books, records, and papers of the Defendant and due and diligent inquiry of the agents and employees of the Defendant regarding the matters referred to in these interrogatories?
- 2. Please state the total number of persons who were employed by the Defendant during each week during 2004 and 2005, both full-time and part-time.
- 3. Please state the name, race, and title of the person who made the decision as to which applicant to select for the position of Assistant Administrator/Court Clerk in the Summer of 2005.
- 4. Please state the name, race, and title of each person who approved or participated in making the decision as to which applicant to choose to fill the position of

Assistant Administrator/Court Clerk in the Summer of 2005, and state the role played by each person.

- 5. Please state the name, race, present employer, and last known home and work address of each person who applied for the position of Assistant Administrator/Court Clerk during the Summer of 2005.
- 6. Please describe in detail the process leading to the establishment of the position of Assistant Administrator/Court Clerk in the Summer of 2005.
- 7. Please state the name, race, and title of each person who played any role in drafting the Class Specification for the position of Assistant Administrator/Court Clerk, class code number 1130, effective date July 22, 2005, and describe the role played by each person.

Dated this 17th day of April, 2008.

/s/Gerald L. Miller GERALD L. MILLER (MIL039) Attorney for Plaintiff Andriette Rowell

OF COUNSEL: REDDEN, MILLS & CLARK, LLP 940 Financial Center 505 20th Street North Birmingham, Alabama 35203 (205) 322-0457

CERTIFICATE OF SERVICE

I hereby certify that on <u>April 17, 2008</u>, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Randall Morgan, Esq. Hill, Hill, Carter, Franco, Cole & Black, P.C. 425 South Perry Street P.O. Box 116 Montgomery, Alabama 36101-0116

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/s/Gerald L. Miller
Of Counsel